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*Attorneys for Defendant*, MONIQUE CONTRERAS

**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION**

PEOPLE OF CITY OF LOS ANGELES  
WHO ARE UN-HOUSED, AS A  
CLASS REPRESENTED BY D.  
JACOBS, as representative of a class of  
unhoused persons who reside and resided  
in the streets and on the sidewalks of the  
City of Los Angeles,  
  
Plaintiffs.

v.

KAREN BASS, ERIC MICHAEL  
GARCETTI, PAUL KREKORIAN,  
ROBERT BLUMENFIELD, NITHYA  
RAMAN, KATY YAROSLAVSKY,  
IMELDA PADILLA, MONICA  
RODRIGUEZ, MARQUEECE-  
HARRIS-DAWSON, JOHN LEE,  
CURREN PRICE, HEATHER HUTT,  
TRACI PARK, HUGO SOTO-  
MARTINEZ, KEVIN DE LEON, TIM  
Mc OSKER, MONIQUE CONTRERAS,  
1 "DOE" BROWN, ONE HUNDRED  
UNKNOWN NAMED DEFENDANTS,  
1-100,

Defendants.

CASE NO. 2:24-cv-09320 DOC (MAAx)  
*Assigned to: Hon. Judge David O. Carter, Ronald  
Reagan Cthse, Ctrm 10A; Hon. Mag. Maria A. Audero,  
Roybal Bldg, Ctrm. 880*

**DEFENDANT MONIQUE  
CONTRERAS'S REQUEST FOR  
JUDICIAL NOTICE AND EXHIBITS  
IN SUPPORT OF OPPOSITION TO  
PLAINTIFF'S MOTION FOR  
"PARTIAL SUMMARY JUDGMENT  
ON ISSUES F EXCESSIVE FORCE  
AND OF MALIICIOUS  
PROSECUTION"**

[Filed concurrently with Opposition to Plaintiffs'  
Motion for Partial Summary Judgment;  
Objections to Statement of Uncontroverted Facts  
and Conclusions of Law and Additional Genuine  
Issues of Material Fact; Declaration of Eric  
Melendez and Exhibits; Notice of Lodging]

DATE: June 2, 2025  
TIME: 8:30 AM  
CTRM: 10A

**TO THE ABOVE-ENTITLED COURT AND TO PLAINTIFFS AND THEIR  
COUNSEL OF RECORD HEREIN:**

Pursuant to Federal Rule of Evidence 201(b)(2), Defendant **OFFICER MONIQUE CONTRERAS** respectfully submits this Request for Judicial notice in support of her Opposition to Plaintiffs' Motion for Partial Summary Judgment on Issues of Excessive Force and Malicious Prosecution.

Defendant requests that this Court take judicial notice of the misdemeanor complaint and criminal court minute orders in *The People of the State of California v. David Jacobs*, Los Angeles County Superior Court Case No. 24ARCM04227-01, which are attached to the supporting Declaration of Ty A. Ford submitted concurrently herewith.

This Request for Judicial Notice is made pursuant to Rule 201 of the Federal Rules of Evidence as well as *Mack v. South Bay Beer Distributors, Inc.*, 798 F.2d 1279, (9th Cir. 1986); *Lee v. Cty of Los Angeles*, 250 F.3d 668, (9th Cir. 2001). This request for judicial notice will be based upon the attached Declaration of Deputy City Attorney Ty A. Ford and Exhibits; Defendant's Opposition to Plaintiffs' Motion for Partial Summary Judgment on Issues of Excessive Force and Malicious Prosecution; the pleadings and records contained in the Court's file; and any other oral and documentary evidence presented to the Court at or before the time of the hearing on this Motion.

Dated: May 12, 2025

**HYDEE FELDSTEIN SOTO**, City Attorney  
**DENISE C. MILLS**, Chief Deputy City Attorney  
**KATHLEEN KENEALY**, Chief Assistant City Attorney  
**CORY M. BRENT**, Senior Assistant City Attorney

By: Ty A. Ford

TY A. FORD, Deputy City Attorney  
Attorneys for Defendant, MONIQUE CONTRERAS

**MEMORANDUM OF POINTS AND AUTHORITIES**

**I. INTRODUCTION**

Federal Rule of Evidence Rule 201(b)(2) allows a Court to take judicial notice of a fact that is not subject to reasonable dispute and is capable of accurate and ready determination by resort to sources whose accuracy cannot reasonably be questioned. “Facts are indisputable, and thus subject to judicial notice, only if they are either ‘generally known’ under Rule 201(b)(1) or ‘capable of accurate and ready determination by resort to sources whose accuracy cannot be reasonably questioned’ under Rule 201(b)(2).” *United States v. Ritchie*, 342 F.3d 903, 909 (9th Cir. 2003).

A Court shall take judicial notice if requested by a party and the Court is supplied with the necessary information. Fed.R.Evid. 201(c)(2).

In addition, the court is empowered to take judicial notice of court files and records and other public records. *See Lee v. Cty of Los Angeles*, 250 F.3d 668, 689 (9th Cir. 2001).

Based on the foregoing, the Court may take judicial notice of:

**Exhibit 5** - Copy of the Misdemeanor Complaint in the matter of *The People of the State of California v. David Jacobs*, Los Angeles County Superior Court Case No. 24ARCM04227-01.

**Exhibit 6** – Copy of the criminal court’s minute order dated 09/04/24

**Exhibit 7** – Copy of the Mental Health Court minute order dated 09/18/24

**Exhibit 8** – Copy of the Mental Health Court minute order dated 10/02/24.

**Exhibit 9** – Copy of the Mental Health Court minute order dated 10/23/24.

Dated: May 12, 2025

**HYDEE FELDSTEIN SOTO**, City Attorney  
**DENISE C. MILLS**, Chief Deputy City Attorney  
**KATHLEEN KENEALY**, Chief Assistant City Attorney  
**CORY M. BRENT**, Senior Assistant City Attorney

By: Ty A. Ford

TY A. FORD, Deputy City Attorney  
*Attorneys for Defendant*, MONIQUE CONTRERAS

**DECLARATION OF TY A. FORD**

I, TY A. FORD, declare as follows:

1. I am an attorney at law, duly licensed to practice law in all the courts of the State of California, including the Central District of California. I am employed as a Deputy City Attorney for the City of Los Angeles in the Police Litigation Section. I have personal knowledge of the information set forth below, except those things set forth on information and belief, and as to those things, I believe them to be true.

2. **Exhibit “5”** attached hereto is a true and correct copy of the Misdemeanor Complaint in the matter of *The People of the State of California v. David Jacobs*, Los Angeles County Superior Court Case No. 24ARCM04227-01.

3. **Exhibit “6”** attached hereto is a true and correct copy of the criminal court’s minute order dated 09/04/24

4. **Exhibit “7”** attached hereto is a true and correct copy of the Mental Health Court minute order dated 09/18/24

5. **Exhibit “8”** attached hereto is a true and correct copy of the Mental Health Court minute order dated 10/02/24.

6. **Exhibit “9”** attached hereto is a true and correct copy of the Mental Health Court minute order dated 10/23/24.

I declare under penalty of perjury pursuant to the laws of the United States of America, and the State of California that the foregoing is true and correct.

Executed this 12<sup>th</sup> day of May 2025 at Los Angeles, California

*Ty A. Ford*  
TY A. FORD, Declarant